

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

UMB BANK, N.A., as Trustee,

Plaintiff,

- against -

SANOFI,

Defendant.

Case No. 15 Civ. 08725 (GBD)  
(JCF)

**NOTICE OF PLAINTIFF'S MOTION TO COMPEL  
THE PRODUCTION OF DOCUMENTS**

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law in Support of Plaintiff's Motion to Compel the Production of Documents, the Declaration of Daniel R. LeCours, and the exhibits attached thereto, Plaintiff UMB Bank, N.A., as Trustee, hereby moves, by and through its undersigned attorneys, before the Honorable James C. Francis, United States District Judge at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 18B, New York, New York 10007, on such date and time as the Court determines, for an Order:

- (i) Compelling Defendant Sanofi to produce the post-July 29, 2016 versions of the core budget, marketing, and sales documents specifically-referenced in the Trustee's March 3, 2017 letter;
- (ii) Compelling Defendant Sanofi to produce the post-July 29, 2016 versions of other regularly-created Sanofi core budget, marketing, and sales documents concerning Lemtrada; and

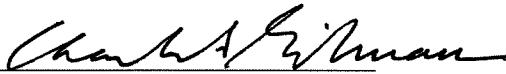
(iii) Awarding Plaintiff such other and further relief as the Court may deem just and proper.

Plaintiff respectfully requests that oral argument be granted to aid the Court in its disposition of this Motion.

Respectfully submitted,

Dated: September 26, 2017

CAHILL GORDON & REINDEL LLP

By: 

Charles A. Gilman

Michael B. Weiss

Daniel R. LeCours

Brent L. Andrus

Eighty Pine Street

New York, NY 10005-1702

(212)-701-3000

cgilman@cahill.com

mweiss@cahill.com

dlecours@cahill.com

bandrus@cahill.com

*Attorneys for Plaintiff UMB Bank, N.A., as Trustee*